

**UNITED STATES
DISTRICT COURT
NORTHERN DISTRICT OF
ILLINOIS EASTERN
DIVISION**

UNITED STATES OF AMERICA)	
Plaintiff,)	
V.)	No. 16 CR 429
Gus Dahleh)	Honorable
)	Matthew F Kennelly,
Defendant,)	Judge Presiding

**MOTION TO MODIFY THE
CONDITIONS OF PROBATION TO
ALLOW TRAVEL**

NOW COMES the defendant, Gus Dahleh, by and through his attorney, Jeffrey B. Steinback, and without opposition from the Government, respectfully moves this Honorable Court for the entry of an order to modify conditions of probation to allow travel. In support of this motion, defendant offers the following:

1. On 1/26/2018 the defendant pled guilty to Count 1 of the Information.
2. On June 13, 2019, this Honorable Court sentenced Mr. Dahleh to 1 day, with credit for time served, followed by 3 years of probation on Count 1.
3. Mr. Dahleh's fiancé, lives in California, as does her very ill father, his father-in-law to-be.
4. As discussed in Court, at Mr. Dahleh's sentencing hearing, Gus has an extremely close relationship with his soon to be father-in-law, becoming an important advocate for and caretaker of him. Gus also accompanies him on doctor and hospital visits and provides emotional, physical, and some financial support to him.
5. Mr. Dahleh, because of this special relationship with his father-in-law-to-be, travels to and from California frequently, offering assistance and support each trip, often multiple times per month.
6. Gus's fiancé, knows the importance of these visits, and has assumed

responsibility for the transportation fees and other costs for Gus's travel.

7. Mr. Dahleh also has family that he is very close to in southern Wisconsin. Occasionally during the year, there are family gatherings and celebrations that Gus would like to attend. Allowing him this ability to travel will insure that he remain close with his family, and will be able to participate, often with his children, at these family events.
8. To obviate the need for multiple monthly motions, Mr. Dahleh respectfully requests that an Order be filed that grants him permission to travel throughout the continental United States, with the requirement that Mr. Dahleh will provide a detailed itinerary to AUSA Matthew Madden, and his Probation Officer, Jessica Cook including any contact information for him during any time he is away.
9. AUSA Matthew Madden has been contacted and has no objection to the modification.
10. US Probation Officer, Jessica Cook, while having allowed travel in the past, opposes this motion and would like to address her concerns during the hearing in Court.
11. Mr. Dahleh greatly appreciates the Court's consideration in regard to this matter, and prays that the conditions of his probation will be modified to allow him be present to help his future father-in-law with his ill health as well to travel to participate in out-of-state family events.

WHEREFORE the defendant Gus Dahleh, respectfully moves this Honorable Court to enter an order modifying the conditions of his bond to allow travel, for the reasons stated above.

Respectfully submitted,

/s/Jeffrey B. Steinback

Jeffrey B. Steinback
Attorney at Law
8351 Snaresbrook Rd
Roscoe, IL 61073
847-624-9600

